

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS’ RESPONSE IN OPPOSITION TO CURLING  
PLAINTIFFS’ MOTION FOR LEAVE FOR ADDITIONAL PAGES**

State Defendants respond in opposition to Curling Plaintiffs’ request for additional pages. [Doc. 1366]. The State Defendants’ motion, to which Curling Plaintiffs ostensibly responded, totaled thirteen pages. Curling Plaintiffs’ counsel—through his paralegal—requested additional time to respond on March 30, 2022, to which State Defendants did not object. At that time, Curling Plaintiffs made no mention of the need for additional pages to respond to a simple motion.

Approximately five minutes before filing a response, Curling Plaintiffs requested this Court grant them leave to file a brief totaling forty pages—fifteen pages beyond the limit provided in Local Rule 7.1(D). However, the Local Rules require “**prior** permission of the court” to exceed page

limitations. N.D. Ga. L.R. 7.1(D). Moreover, Curling Plaintiffs failed to demonstrate good cause in their request, simply assuming the Court would grant their request—as they have done repeatedly in this case—and filing their non-compliant response.

On the substance, State Defendants rely upon the position they have stated before:

As is the custom in this District, State Defendants will not use a Response to a Motion on page limits to argue the merits of the case, nor to attack the Curling Plaintiffs or respond to the gratuitous attacks contained in Curling Plaintiffs' Motion. Such is not conducive to the efficient resolution of this case and is disrespectful to this Court and opposing counsel.

[Doc. 850 at 2]. The State Defendants likewise rely upon that position with respect to Curling Plaintiffs' motion for additional time to respond. [Doc. 1356].

Respectfully submitted, this 25th day of April 2022,

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*Counsel for State Defendants*

**L.R. 7.1(D) CERTIFICATION**

I certify that this Response has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Response has been prepared using 13-pt Century Schoolbook font.

/s/ Vincent R. Russo  
Vincent R. Russo